## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

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Quality Candy Shoppes/Buddy Squirrel of Wisconsin, Inc.,

Case No. 10-20464-mdm

Debtor.

Chapter 11

## MOTION TO OBTAIN UNSECURED CREDIT PURSUANT TO 11 U.S.C. § 364(C)(1)(3)

The Debtor hereby moves the Court to obtain unsecured credit pursuant to 11 U.S.C. § 364(c)(1)(3) and in support thereof, alleges and shows to the Court as follows:

- 1. The Debtor filed a Petition for relief under Chapter 11 of Title 11, United States Code on January 15, 2010.
- 2. In the event that the Debtor either does not get the consent of Harris Bank to use cash collateral, or the Court refuses to permit the Debtor to use cash collateral, or the Court orders the Debtor can use part of Harris Bank's cash collateral but not all to continue its business, the Debtor is requesting that on an emergency basis, that the Court permit its president, Margaret Gile, to loan \$100,000 to the Debtor at no interest, having a junior lien on the Debtor's property, and having super priority over other administrative expenses pursuant to 11 U.S.C. § 364(c)(1)(3). The funds will be used primarily to fund the \$88,000 payroll that Debtor must make on January 22, 2010.
  - 3. The Debtor alleges that it has been unable to obtain credit pursuant to 11 U.S.C. § 364(a). Dated this 18<sup>th</sup> day of January, 2010.

LAW OFFICES OF JONATHAN V. GOODMAN Attorneys for Debtor

By:

/s/ Jonathan V. Goodman

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